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September 20, 2000

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SEP 20 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

SUITE 1170
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SAN FRANCISCO, CA 94111

415.394.7500
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99-273

VIA HAND DELIVERY

Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW, TW-A325
Washington, DC 20554

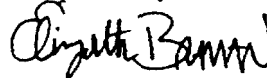
RE: Notice of Ex Parte Communications
CC Docket No. 96-115; CC Docket No. 96-98; CC Docket 99-273

Dear Ms. Salas,

On September 20, 2000, representatives of LSSi Corp. ("LSSi") met with Gregory Cooke, Assistant Division Chief, and Dennis Johnson of the Network Services Division of the Common Carrier Bureau. Representing LSSi at the meeting were Walter Rickard, President and CEO of LSSi, and Bob Helgesen, Vice President of Planning of LSSi. Also in attendance were Gary Cohen, Kristin Smith, and the undersigned of the law firm of Blumenfeld & Cohen, counsel for LSSi.

Addressed at the meeting were issues raised in the above captioned proceeding relating to restrictions of the ability to use directory assistance databases on the internet. An original and one copy of this letter and the distributed materials are being filed with your office. Should you have any questions regarding this matter, please do not hesitate to call me.

Respectfully submitted,


Elizabeth Braman

cc: Gregory Cooke, Assistant Division Chief
Dennis Johnson

Enclosure

Directories And Communications Services

Walt Rickard - LSSi Corp President & CEO

Bob Helgesen - Vice President Planning

9/20/00

LSSi Corp

Who Is LSSi Corp?

- A young company that specializes in providing national and international telephone listings to Directory Assistance operators.
- LSSi acquires its listings directly from the Telcos and builds a new 150M listing Database every night, incorporating daily feeds from its data suppliers.
- In addition to wireline, LSSi intends to provide wireless and e-mail listings, and is currently developing communications services based on DA queries.

LSSi Believes That...

- Widely Available Communications is a “Public Good”
- Good Directories are Central to Quality Communications
- Accurate Directories Should Be Widely Available Across a Variety of Media
- Directories Need to be Global
- The Consumer Should Have Control Over Directory Listing Contents and Should Have Access to Services Such As Call Screening to Manage Privacy
- The Consumer Will Be the Ultimate Beneficiary of the Above Policies

Today's Directory Situation

- “Divestiture” has Balkanized Directory Assistance. There are many more Telcos, many directory DBs, and obstacles to consolidating listings into accurate national DBs;
- Consequently, the consumer must make repeated attempts to locate the right number; often the number can't be found;
- Consumer costs are therefore higher, and satisfaction is lower;
- New services, which might help the situation, are inhibited by restrictions imposed by some Telco listing suppliers.

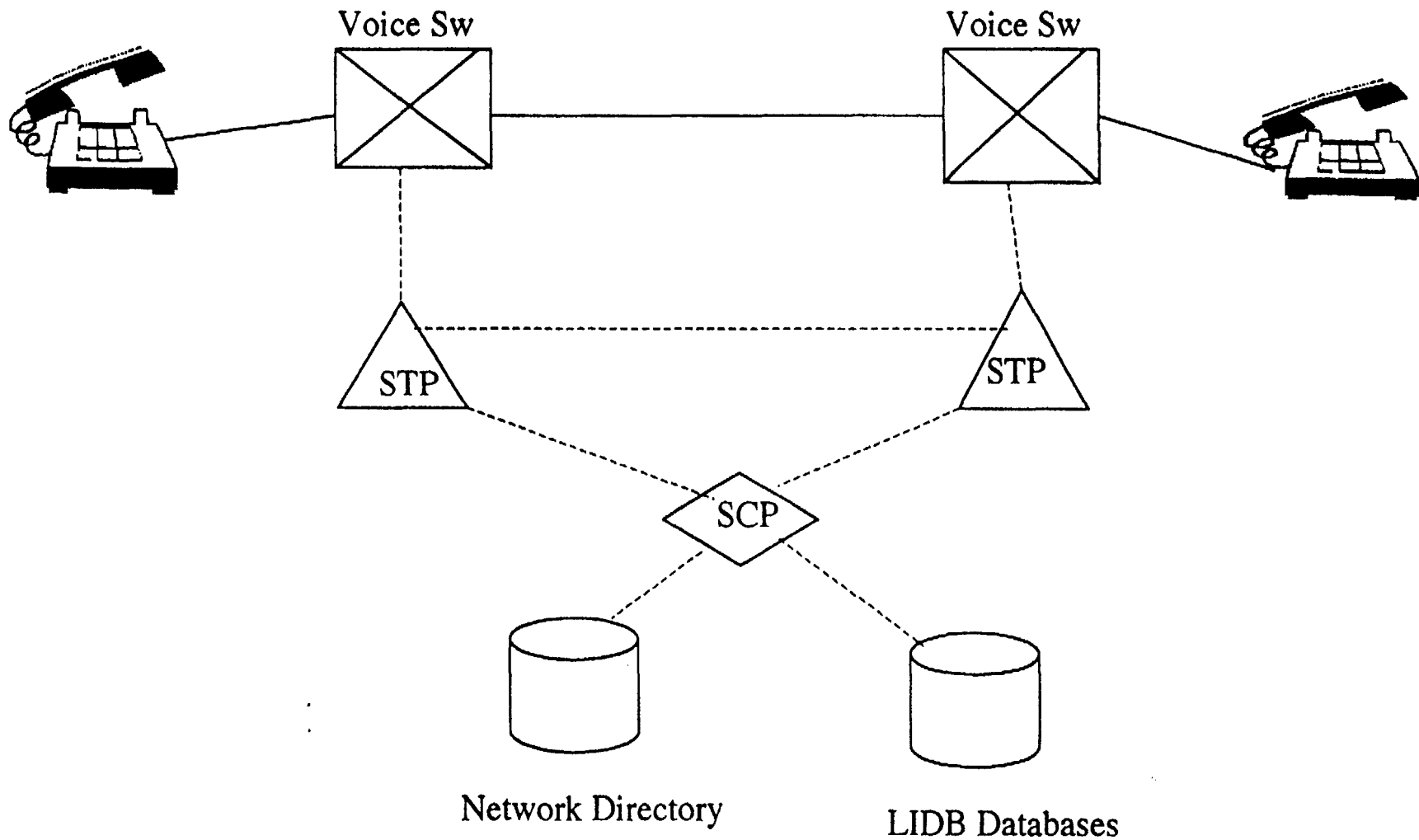
Today, we'd like to discuss this directory situation in more depth by describing in more detail...

...the sources of directory listings and how they are made available to DA Operators;

...how restrictions on the use of directory data limit consumer access;

...several services which could be offered if restrictions were removed.

Today's Communication Network



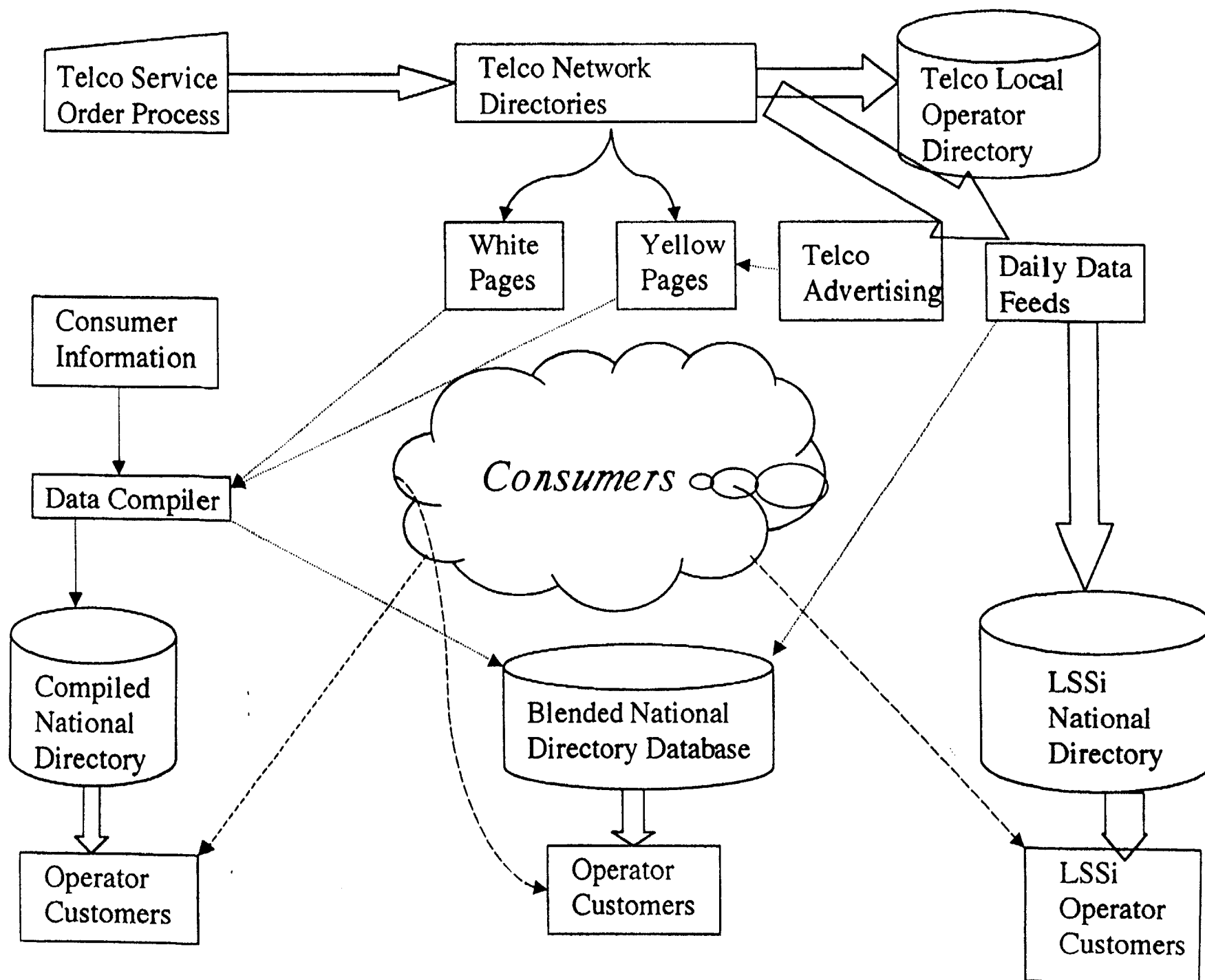
STP = Signal Transfer Point

SCP = Service Control Point

—— = Voice Path

----- = Data Path (eg SS7)

LSSi Corp



Call Screening Services

- Calling Name Service from Public Databases
- Wireless Call Screening
 - Voice Delivery of Calling Name
 - Accept, Reject or Voice Mail based on Name
 - Caller Pays Option

Some Useful Tactics

- Network Administrators should provide current directory info at a reasonable cost and without limitations on use except as required by addressee.
- Similar Policies should apply to Wireless Carriers and E-Mail administrators.
- Calling Parties should identify themselves by number and name, especially if the call is commercial in nature.
- Tools to block specific types of calls based on ID should be made widely available to consumers at reasonable prices.
- Numbering Plans that recognize the difference between public addressing and network addressing.

Summary

- Consumers have become increasingly frustrated with the high cost and uneven quality of today's Directory Assistance.
- One critical cause is the limitations that the Telcos place on the use of their data. Such restrictions against using consumer-friendly formats on the Internet or through AI mechanized operators are:
 - Obstacles to LSSI's introduction of new services;
 - Contrary to consumers interests; and
 - Only serve to further Telco marketing strategy.
- Only consumers should have the ability to restrict the content and usage of their individual listings.
- The FCC should decide that the Telecommunications Act of 1996 prohibits such Telco-imposed restrictions on the usage of DA listings.